

EXHIBIT A

**IN THE STATE COURT OF FULTON COUNTY
 STATE OF GEORGIA**

TIFFANY SNADON)	
)	
Plaintiff,)	CIVIL ACTION
)	FILE NO:
vs.)	
)	
SEW-EURODRIVE, INC., JOESEPH)	JURY TRIAL DEMANDED
TETZEL, WILLIAM HUFFSTETLER,)	
and JOHN DOE 1 through JOHN DOE 3)	
)	
Defendants.)	

COMPLAINT AND DEMAND FOR TRIAL BY JURY

COMES NOW Plaintiff and sues Defendants as follows:

1.

Plaintiff is a resident of the State of Georgia.

2.

Defendant, SEW-EURODRIVE, INC. ("SEW") is a Foreign Corporation organized in the State of Maryland. Defendant's registered agent, National Registered Agents, Inc. of Maryland, is located at 2405 York Road, suite 201, Lutherville-Timonium, Maryland 21093-2264, and may be served with process at this address.

3.

SEW transacts business within the State of Georgia and the tortious act further described herein occurred within Fulton County, Georgia. Therefore, Defendant SEW is subject to the jurisdiction and venue of the State Court of Fulton County, Georgia under the Long-Arm Statute of Georgia. O.C.G.A. §§ 9-10-90. *et seq.*

4.

Defendant, Joeseeph Tetzal is a resident of the State of South Carolina, who may be

served with process at 517 Fox Hurst Court, Moore, Spartanburg County, South Carolina, 29369. Defendant Tetzal is subject to the venue and jurisdiction of this Court.

5.

Defendant, William Huffstetler is a resident of the State of Georgia, who may be served with process at 1351 Matt Lane, Watkinsville, Oconee County, Georgia 30677. Defendant Huffstetler is subject to the venue and jurisdiction of this Court.

6.

At all relevant times, Defendants, John Doe 1 through 3 were entities and/or persons, whose identity and exact whereabouts are currently unknown. John Doe 1 through 3 will be named once their identities are revealed.

7.

On or about April 6th, 2018 (the "date of incident"), Plaintiff was employed with Nth Degree, a tradeshow and marketing company.

8.

Plaintiff's job responsibilities with Nth Degree included assisting trade show participants with the process of setting up their trade show booths.

9.

On the date of incident, Plaintiff assisted Defendant SEW in setting up their trade show booth within the Georgia World Congress Center located at 285 Andrew Young International Blvd NW, Atlanta, GA 30313. The booth included a metal lattice-work frame structure. Photographs of the metal lattice-work structure are attached hereto as Exhibit "A".

10.

Defendants, William Huffstetler and Joeseeph Tetzal were SEW employees, agents or

representatives on the date of incident.

11.

Defendant Joeseeph Tetzal's job responsibilities with SEW included overseeing, managing, and inspecting the assembly of the lattice-work structure for the tradeshow booth. Joeseeph Tetzal was also responsible for distributing safety equipment, including hard hats and protective eyewear.

12.

Construction of the metal latticework required use of specialized tools that were within the possession and control of SEW and its employees, William Huffstetler and Joeseeph Tetzal, on the date of incident. One such tool weighed ten (10) to twenty (20) pounds. A true and correct photograph of said tool is attached hereto as Exhibit "B".

13.

On the date of incident, an individual left one of the specialized tools on the latticework when it was elevated to a height of over ten feet (10').

14.

The tool was not found and/ or removed during a routine inspection of the latticework by William Huffstetler and Joeseeph Tetzal or another SEW employee or agent.

15.

On the date of incident, the specialized tool fell from the elevated height of the latticework structure and struck Plaintiff's head.

16.

At all relevant times, William Huffstetler and Joeseeph Tetzal were acting within the course and scope of their employment with SEW on the date of incident.

17.

Plaintiff was not provided with a hardhat or other appropriate protective equipment to prevent or mitigate injury from such a foreseeable occurrence as the tool falling from the latticework structure.

18.

As a result of the specialized tool striking Plaintiff, Plaintiff has incurred significant injuries and damages, including a concussion and traumatic brain injuries.

19.

On the date of incident, SEW Employees, William Huffstetler and Joeseeph Tetzal, failed to act with that degree of care which is exercised by ordinarily prudent persons under the same or similar circumstances.

20.

Defendants failure to act with such a degree of care directly and proximately led to Plaintiff's bodily injuries on the date of incident.

21.

Defendants negligent acts exposed Plaintiff to an unreasonable risk of foreseeable harm on the date of incident.

22.

Under a theory of *respondeat superior*, SEW is vicariously liable for the negligent acts and resulting injuries caused by William Huffstetler and Joeseeph Tetzal.

23.

SEW is liable for negligent training and/ or supervision of their employees William Huffstetler and Joeseeph Tetzal insofar as such training and supervision either caused or failed to

prevent Plaintiff's injuries.

24.

At all relevant times, Plaintiff exercised reasonable care for her own safety.

25.

As a proximate result of Defendants' negligence, Plaintiff sustained injuries. As a result of Defendant's negligence, Plaintiff has incurred at least \$50,000.00 in past medical expenses. Plaintiff is also entitled to recover lost wages and general damages.

WHEREFORE, Plaintiff prays for and judgment against Defendants as follows:

- a. That Plaintiff recovers special and general damages;
- b. That Plaintiff recovers costs;
- c. That Plaintiff recovers such other relief as is just and proper; and
- d. That all issues be tried before a jury of twelve persons.

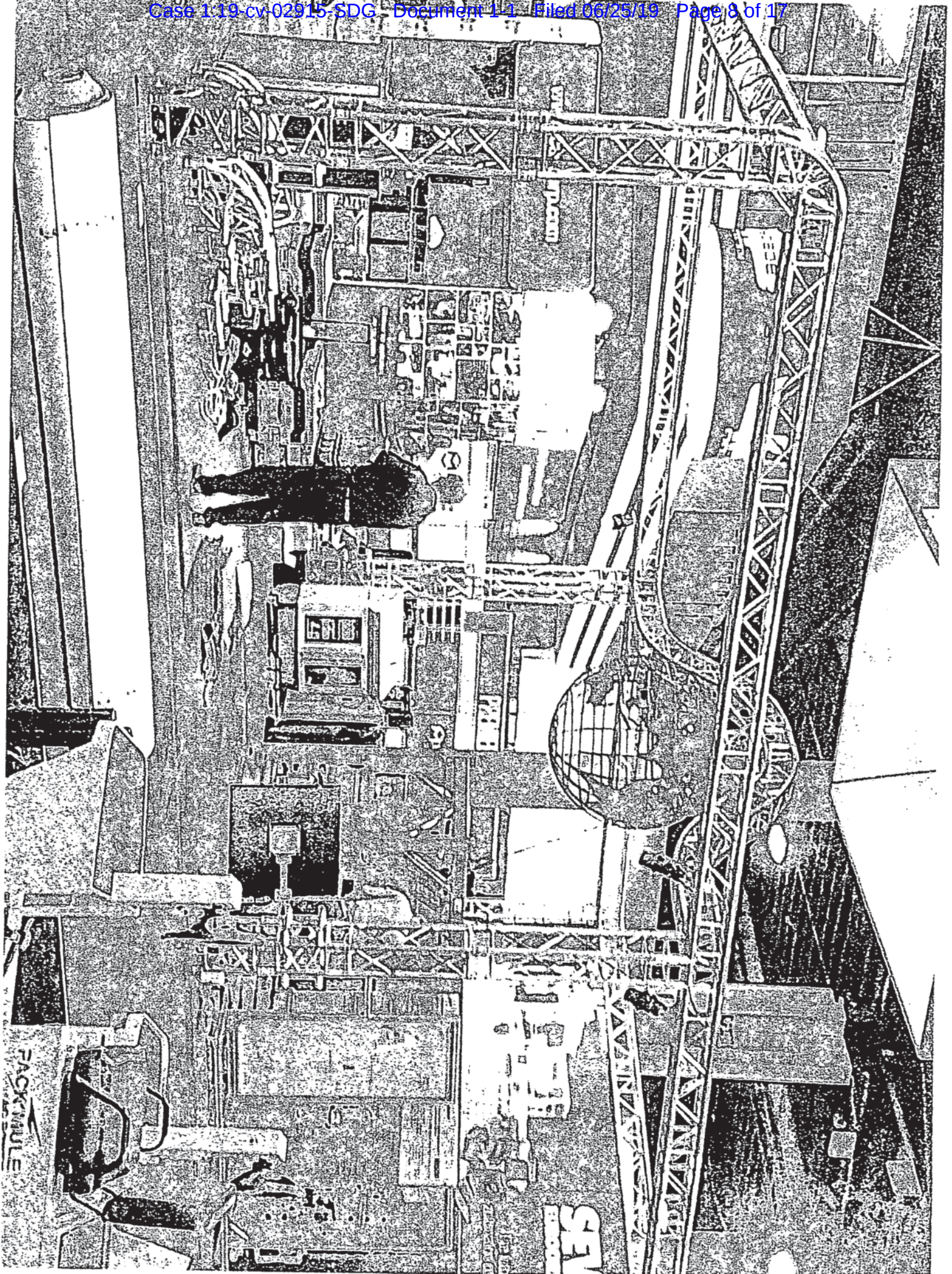
This 11th day of July, 2018.

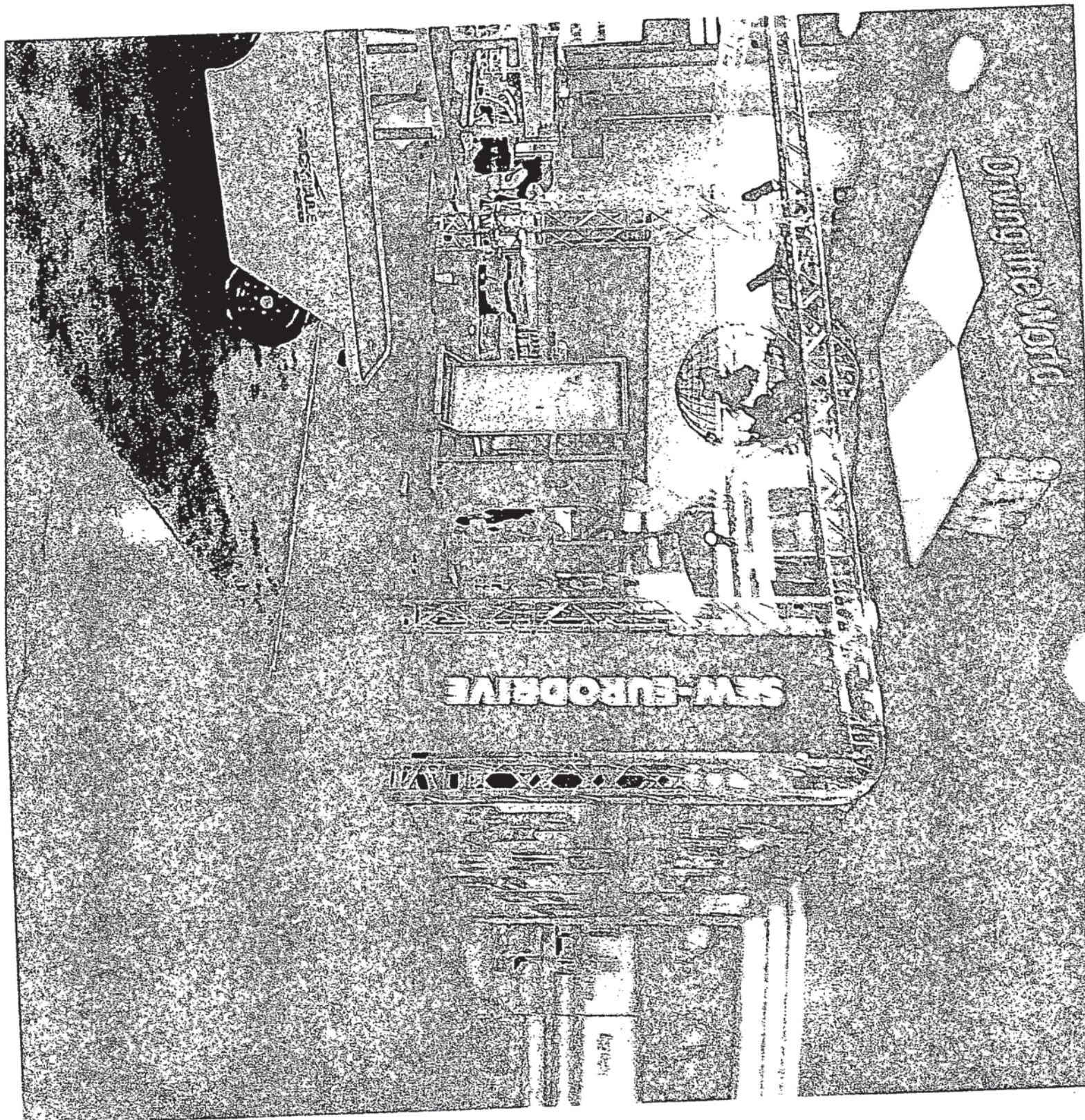
Respectfully submitted,

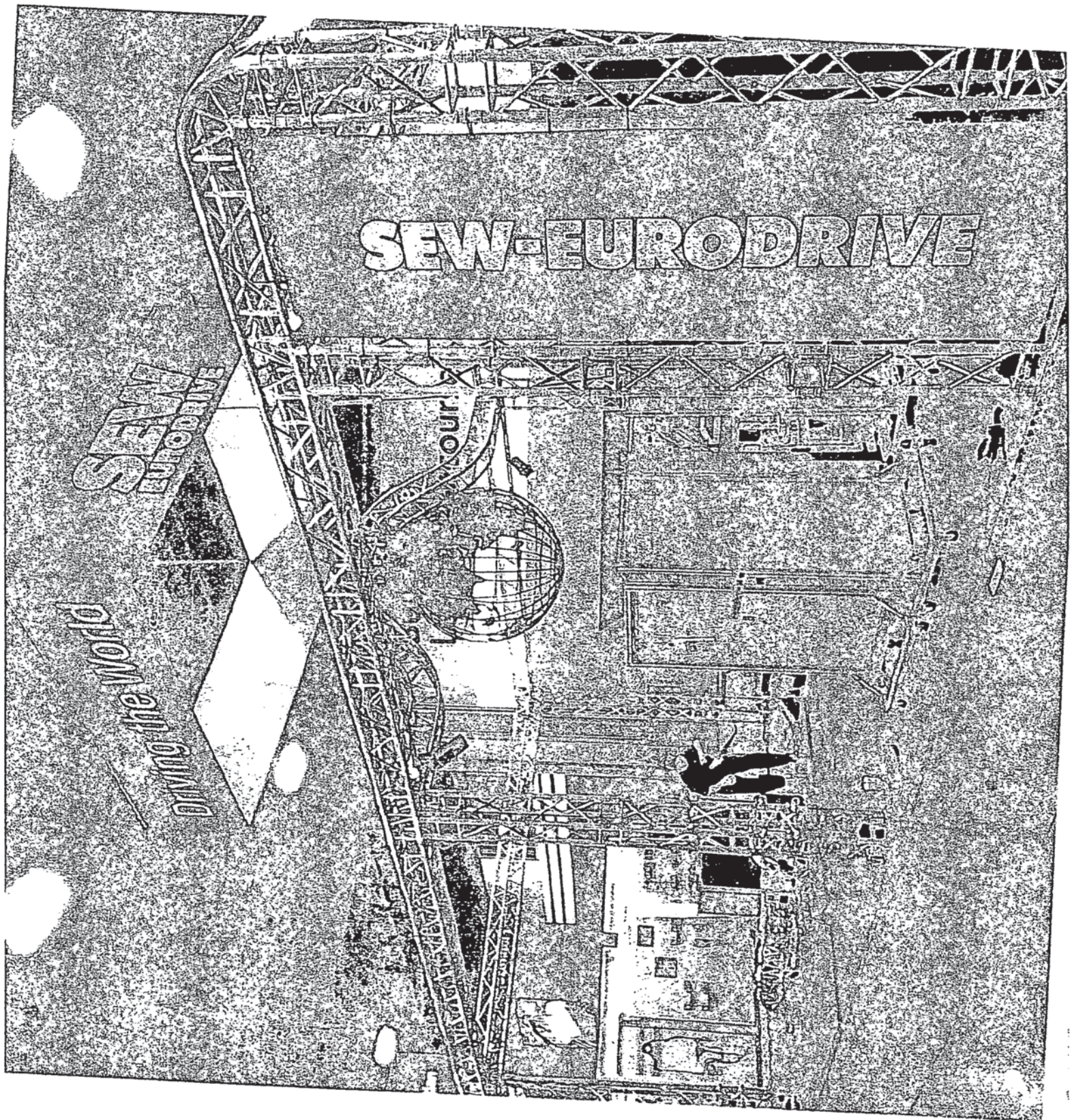
Morgan & Morgan Atlanta, PLLC
P.O. Box 57007
Atlanta, GA 30343-1007
Phone: (404) 965-8811

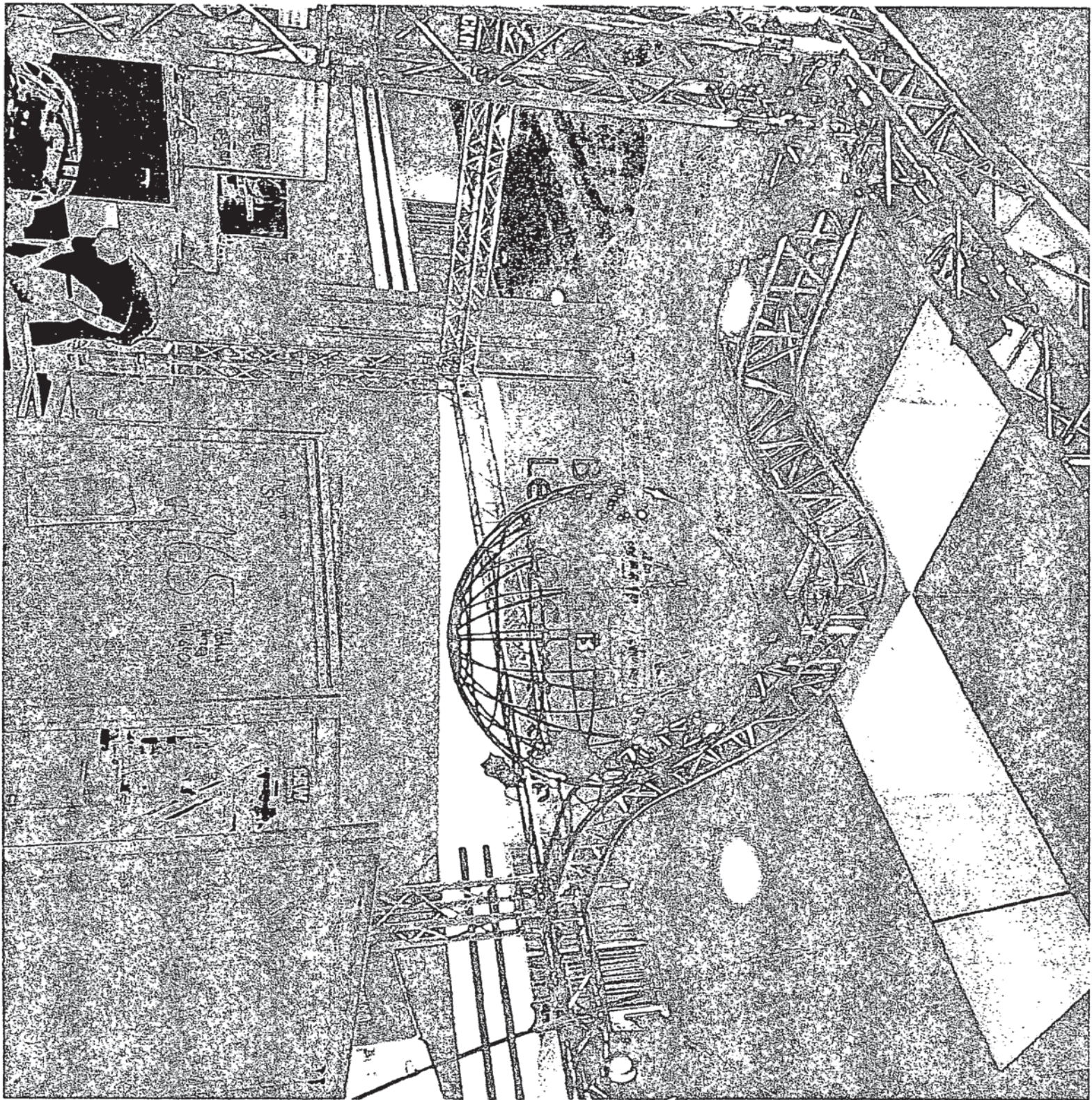
By: /s/ Andrew L. Hagenbush
Andrew L. Hagenbush
Attorney for Plaintiff
Georgia Bar No. 127945

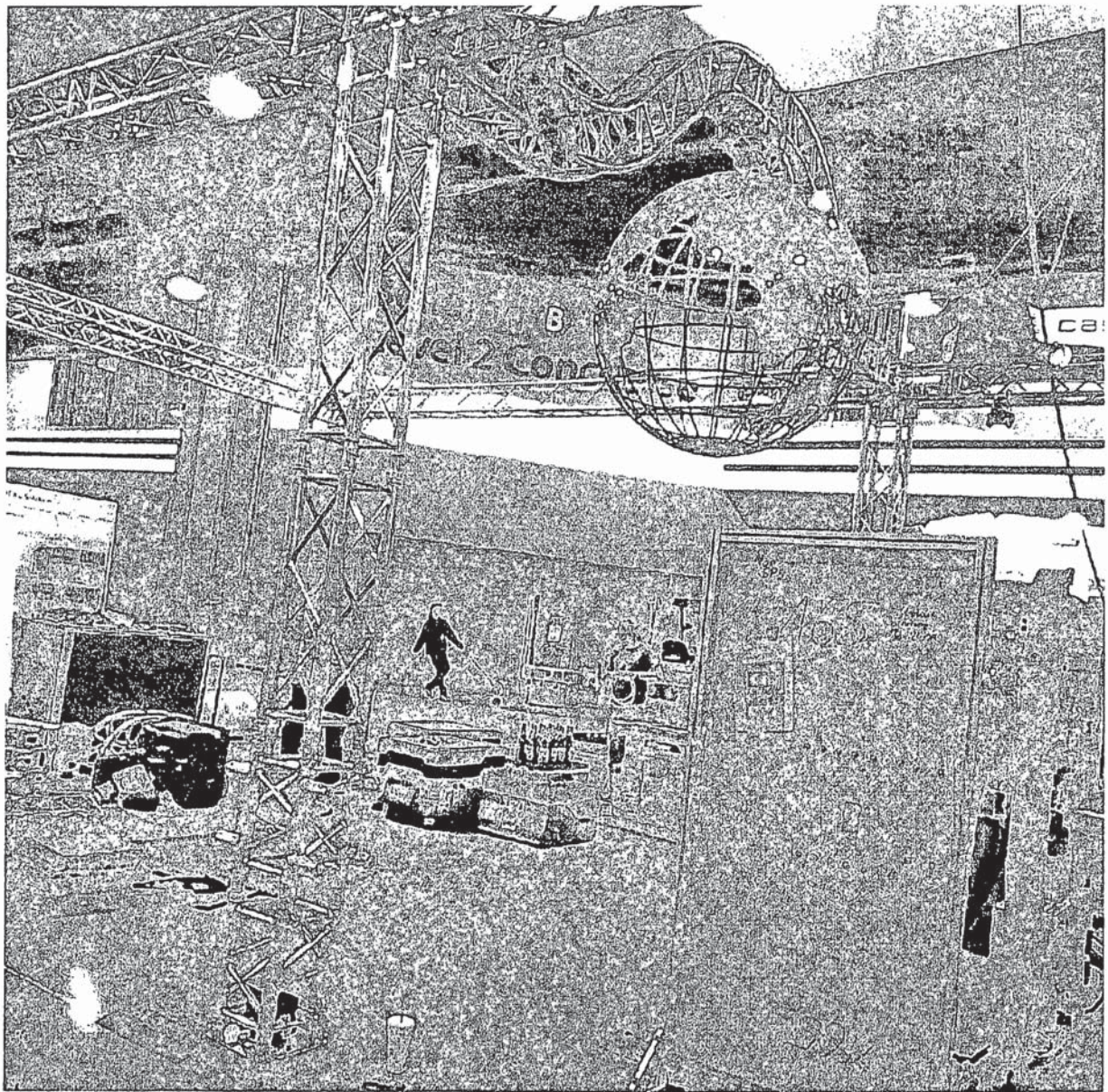
EXHIBIT "A"

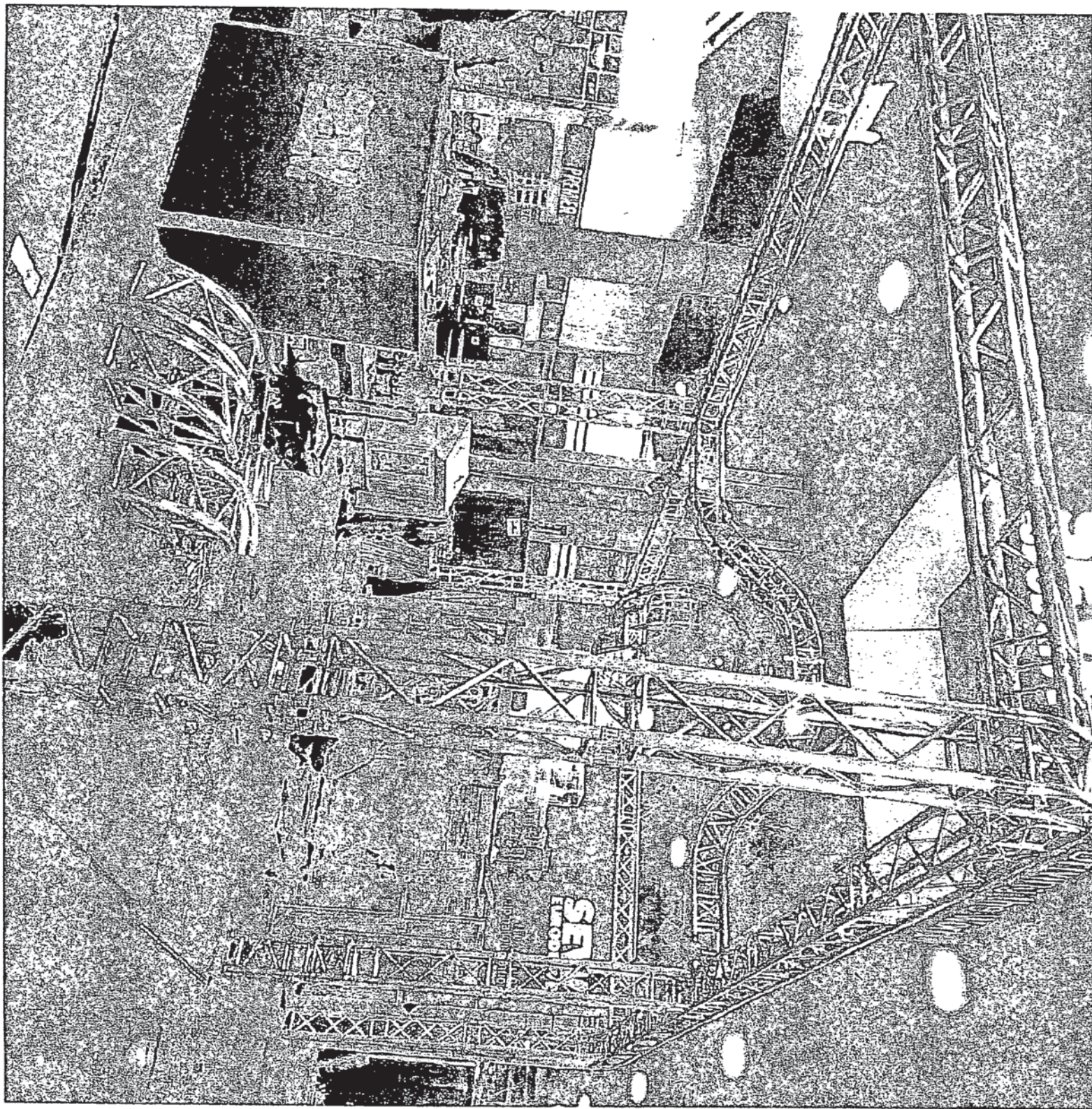












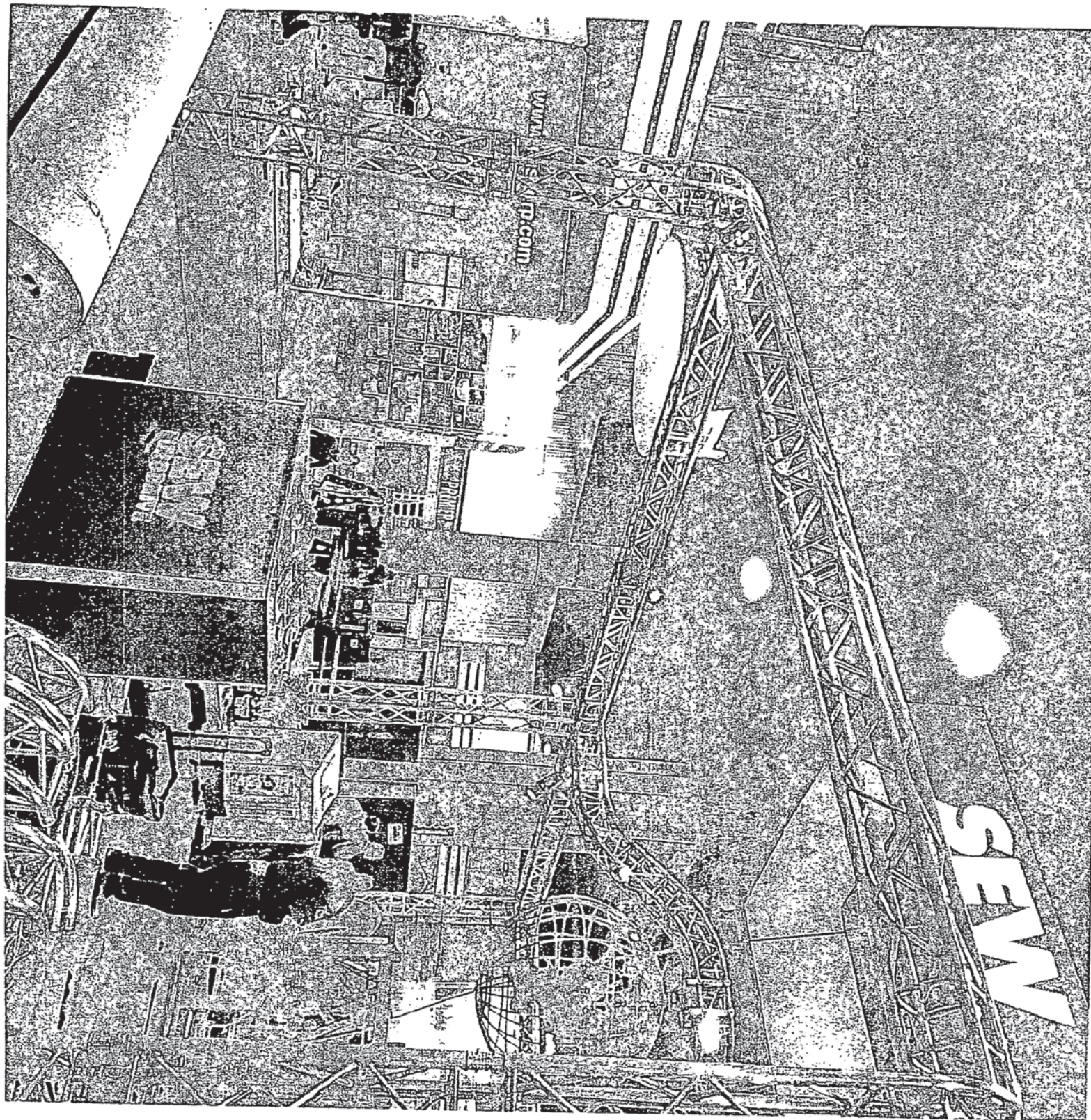


EXHIBIT "B"

